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October 9, 2014
File No. 27080-201

United States Environmental Protection Agency, Region 5
77 West Jackson Blvd., SR-6J
Chicago, Illinois 60604

Attention: Jim Hahnenberg
Remedial Project Manager

Subject: Response to Comments
Remedial Design Work Plan
North Bronson Former Facilities Site
Former Scott Fetzer Facility - Operable Unit 3 (OU3)
Bronson, Michigan

Dear Mr. Hahnenberg:

Attached please find Scott Fetzer's responses to Environmental Protection Agency (EPA), Region 5 comments, provided via email on September 9, 2014, on the Remedial Design Work Plan for the Former Scott Fetzer Facility submitted August 2013. Once concurrence is achieved on all comments and responses, the final RDWP will be reissued reflecting agreed upon language.

If you should have any questions or comments regarding this information, please do not hesitate to contact us at your convenience.

Sincerely yours,
HALEY & ALDRICH OF MICHIGAN, INC.

Keith M. Aragona

Keith M. Aragona, P.E.
Senior Project Manager
Project Coordinator

Attachment

cc: United States Environmental Protection Agency; Attn: Tom Williams, Esq.
Michigan Department of Environmental Quality; Attn: Beth Mead-O'Brien
Michigan Department of Environmental Quality; Attn: C. Graff
Sullivan International; Attn: Tim Maley
Jones Day; Attn: Stephen Giblin, Esq.
Scott Fetzer Company; Attn: David Lamb, Esq.

RESPONSE TO COMMENTS DOCUMENT
Remedial Design Work Plan, North Bronson Former Facilities Site,
Former Scott Fetzer Facility Operable Unit #3, Bronson, Michigan

Comment 1. Section 1, second sentence, page 1: Include the referenced Administrative Order as Appendix A.

Response: Agreed. This information will be added to the text of the revised RDWP.

Comment 2. Section 2.1, first paragraph, after last sentence, page 3: add the following sentence:
Glaciers retreated from the Bronson area 10,000 to 12,000 years ago.

Response: Agreed. This language will be added to the text of the revised RDWP.

Comment 3. Section 2.2, last paragraph, 3r^{d} sentence, page 4: modify as follows:
~~A man made, unlined drainage ditch~~ (CD#30) extends east to west along the northern boundary of the NBIA (Figure 2), and receives groundwater discharge from the North Bronson Industrial Areas (NBIA) Site, the Bronson Wastewater Treatment Plant, the storm sewers, and farm fields before CD#30 ~~it~~ discharges into Swan Creek.

Response: The portion of the text that is struck is a factual description of the construction and function of CD#30 and is recommended to remain. The sentence above will be replaced with the following language in the revised RDWP.

"A man made, unlined drainage ditch (CD#30) extends east to west along the northern boundary of the NBIA (Figure 2) receives discharge from the Bronson Wastewater Treatment Plant, the storm sewers, and farms fields and may periodically receive groundwater discharge from the NBIA Site. CD#30 discharges into Swan Creek. "

Comment 4. In 1996, as part of an investigation of the Industrial Sewer, MDEQ assessed the section of pipe that extends east to west beneath Railroad Street and State Street, adjacent to the northern boundary of the Site. ~~The~~ MDEQ determined that this section of sewer pipe was used to discharge process waste to the Eastern and Western Lagoons. ~~Subsequent investigations indicate that these manholes were related to the Industrial Sewer~~ During the 1996 and 1998 investigations, MDEQ determined which manholes were related to the industrial sewer lines that discharged process water to the Western Lagoon. The MDEQ also collected and analyzed soil and groundwater samples along the northern portion of former Plant #1. Results of these investigations indicated detectable TCE concentrations in soil and groundwater, as discussed in MDEQ Technical Memoranda 1 (1998) and Technical Memoranda 2 (1999). Concentrations of metals and VOCs were also identified in sediment collected from manholes along the Industrial Sewer and in soils

below the manholes in the vadose zone, and metals and VOCs in the shallow groundwater below the manholes and sewer lines.

Response: Agreed. This language will be added to the text of the revised RDWP.

Comment 5. Section 3.2.1, page 7: clarify what part of the industrial sewer was investigated.

Response: Vertical Aquifer Profiling (VAP) samples adjacent to the former Industrial Sewer were collected along State Street, N. Walker Street, and W. Railroad Street. This language will be added to the text of the revised RDWP.

Comment 6. Section 3.2.2, page 7: explain rationale regarding why screens were set to a depth of 25-30 feet below land surface.

***Response:** As described in the Field Event II Technical Memorandum and the approved February 2008 Remedial Investigation Report, "The proposed screened interval (25 to 30 feet bgs) was selected based on the [VAP] VOC results and in order to correspond with approximate screened intervals for existing nearby monitoring wells". This language will be added to the text of the revised RDWP.*

Comment 7. Section 3.2.2, page 7: screened interval for well SFM-03S is indicated as 10-15 feet below land surface in the table near the bottom of page 8, not 25-30 feet as indicated in Section 3.2.2, page 7. Please clarify.

***Response:** The reference to SFMW03S on page 7 is incorrect; the depth of this well is 10 to 15 feet bgs. This language will be corrected in the revised RDWP.*

Comment 8. Section 4.2, Groundwater, second paragraph, last sentence, page 13: modify as follows by deleting this sentence:
~~**These observations and the findings of the USGS report indicate that iron and manganese concentrations in the site groundwater are naturally occurring.**~~

***Response:** This sentence is a conclusion is based on an evaluation of USGS data provided in the preceding paragraph of the RDWP. This evaluation concludes that concentrations of iron and manganese are a result of the geologic formation rather than historic activities that occurred at the facility. This sentence is also included in the approved February 2008 Remedial Investigation Report and the June 2009 Feasibility Study. This sentence should not be removed from the RDWP.*

Comment 9. Section 4.2, Groundwater, pages 13-14: provide depth of groundwater samples with elevated aluminum concentrations.

Response: *Agreed. This language will be added to the text of the revised RDWP.*

Comment 10. First paragraph of section, Section 5.2, page 16: modify as follows:
Remediation goals for soil and groundwater are specified in the ROD and SOW.
~~**However, the 2012 enactment of Michigan Act 190 and recent changes to the Michigan Part 201 criteria may affect the final remediation goals for NBFF OU3. Based on these changes, a**~~**A discussion of the final remediation goals is provided in Sections 5.3 and 5.4.**

Response: *The requested modification will be made.*

Comment 11. Section 5.2, Michigan Act 190 and GSI Criteria, first two paragraphs, page 18: modify as follows by deleting the following language:
~~**Michigan Act 190, which was enacted in 2012, changed the application of GSI criteria. Based on the provisions of Act 190, the GSI criteria are not applicable to a surface water body if it is a man made ditch solely for wastewater or storm water converyance, treatment, or control. Since CD#30 meets these criteria, GSI criteria do not apply at CD#30.**~~

~~**In any event, based on the changes to Part 201 Criteria described above, the SVIIC is not the stringent TCE criteria for RAO's listed in Section 9.1 of the ROD, replacing GSI Protection criterion.**~~

Actions at the Fetzer Site (OU2) should be consistent with the LA Darling Site. Alternatives for groundwater actions include: treatment of soils and groundwater such that groundwater meets GSI and drinking water standards or hydraulic control such that groundwater exceeding GSI and drinking water standards do not migrate off-site.

Response: *The above statement is factual. However, while Scott Fetzer does not agree with the Agency's position with respect to the status of CD#30, Scott Fetzer will strike reference to applicability of the criteria based on the status of CD30 as a surface water. However, based on current groundwater data at the site, soil TCE SVIIC is now the most stringent criteria for RAOs. Text will be struck as described above and the following language inserted in the revised RDWP:*

"Based on updates to MDEQ generic cleanup criteria, SVIIC is now the most stringent TCE criteria for RAOs listed in Section 9.1 of the ROD, replacing the GSI Protection criterion."

Comment 12. Section 5.3, Table in lower half of the page, page 19: table should be consistent with modifications discussed in Comment 10, above.

***Response**: Based on our evaluation of groundwater, changes to the table are not required.*

Comment 13. Section 61.1., third paragraph, page 21: modify as follows:
The highest PCE concentration detected in soils samples collected from Plant #1 was 15,000 ug/kg at VAP006, which exceeds soils standards of 100 ug/kg, protective of groundwater, including GSI standards. ~~is below Michigan Part 201 Non-Residential SVIIC of 21,000 ug/kg. The area at VP006 will there for not be addressed during RA.~~

***Response**: The inserted language regarding the 100 ug/kg groundwater protection based soil standard is not relevant for the RDWP because the 2009 ROD does not reference groundwater protection criterion. Furthermore the inserted language "**including GSI standards**" with respect to PCE does not warrant deletion of the language that the RA will not include VAP-006. Groundwater migration is the sole mechanism that results in GSI impacts. Groundwater data collected for several years across the site demonstrate that generic GSI criterion for PCE in groundwater (60 ppb) is not exceeded at the property boundary at the site. Given the decades that have passed since historic releases occurred at the site, it is reasonable to conclude that the extent of leaching from soil to groundwater is best assessed by actual groundwater quality. The absence of PCE in groundwater that exceeds the GSI criterion at the property boundary supports the conclusion that remedial action of PCE in soil below the SVIIC criterion is not warranted. Therefore, we recommend the existing language referenced in the RDWP remain unchanged.*

Comment 14. Page 13: provide a table similar to that on page 19, listing goals for groundwater.

***Response**: Agreed. This information will be added to the text of the revised RDWP.*

Comment 15. Section 6.1.3, first paragraph, page 22: modify as follows:
The Industrial Sewer located at the perimeter of NBFF OU3 along State Street and N. Walker will be removed. as per the ROD with stubs to sewers adjoining removed sewers closed off.

***Response**: Based on the sewer log completed during Field Event I and described in the February 2008 Remedial Investigation report, many of the laterals appeared to be plugged with concrete. However, if identified, stubs originating from the Scott Fetzer facility that are not abandoned will be plugged. If additional stubs are identified, an evaluation will be completed to determine whether they are active storm drains. The sentence above will be replaced with the following language in the revised RDWP.*

"The Industrial Sewer located at the perimeter of NBFF OU3 along State Street and N. Walker will be removed as per the ROD. If open laterals connecting adjacent sewers to the Industrial Sewer are observed, they will be evaluated and appropriately abandoned."

Comment 16. Section 6.1.3, first sentence, second paragraph, page 22: modify as follows:
If present, the Industrial Sewer and its contents will be excavated and removed, and connections to other sewers severed and plugged, along State ~~Street~~ and N. Walker Streets, provided the City of Bronson approves, and ~~that~~ existing subsurface utilities allow.

***Response**: Based on the sewer log completed during Field Event I and described in the February 2008 Remedial Investigation report, many of the laterals appeared to be plugged with concrete. However, if identified during construction, Industrial Sewer connections to other sewers that are not abandoned will be plugged after an evaluation is completed to determine whether they are active storm drains. The sentence above will be replaced with the following language in the revised RDWP.*

"If present, the Industrial Sewer and its contents will be excavated and removed along State Street and N. Walker Streets, provided the City of Bronson approves, and that existing subsurface utilities allow. If open laterals connecting adjacent sewers to the Industrial Sewer are observed, they will be evaluated and appropriately abandoned."

Comment 17. Section 6.1.3, third paragraph, second sentence page 22: modify as follows:
The presence or absence of the Industrial Sewer along N. Walker Street ~~will be verified via~~ will be evaluated after discussions with the Bronson city manager, including information on the excavation depth and extent during sanitary sewer installation. as well conducting other surveys, as appropriate.

***Response**: Agreed. This language will be added to the text of the revised RDWP.*

Comment 18. Section 6.2, Institutional Controls, page 25: Based on the Institutional Control Implementation and Assurance Plan (ICIAP), institutional controls to restrict groundwater and land use at NBFF OU3 should be discussed. A warranty deed restriction will be required to prohibit use of groundwater at the Site and limit future Site use to industrial/commercial, and will require a modification to the deed to be filed in the Branch County deed office. The Branch County Health district will also receive notice to minimize the likelihood of issuance of a drinking water well permit at the Site. In addition, a groundwater use restriction ordinance may be enacted by the City of Bronson to address groundwater contamination with the NBIA and NBFF Sites as part of the RA for NBIA OU1. These matters will be addressed in the ICIAP.

***Response**: Noted.*

Comment 19. Section 6.3, after end of Section, top of age 26: add the following sentence: Aquifer pilot tests may be necessary during Phase 2 RD.

***Response**: Agreed. This language will be added to the text of the revised RDWP.*

Comment 20. Section 7.1, page 27: add the following sentence after the first paragraph: Initially, the SVE system will be run by itself without AS wells.

Performing the pilot test in this manner will develop a better understanding of how the SVE system effects the vadose zone soils and contaminant removal efficiency.

***Response**: Agreed. This language will be added to the text of the revised RDWP.*

Comment 21. Section 8.3, page 32: the Institutional Control Implementation and Assurance Plan (ICIAP) discussion should be moved to Section 8.1 (30% Design). The draft ICIAP should be developed earlier in the design, not in the 100% Design. Submittal of the first draft ICIAP in the 100% Design is too late in the process, and would not allow review and modification early enough in the process. Submittal as part of the 100% Design would be inefficient and delay completion of the design. Draft documents that have been previously undergone review and revision/refinement should part of the 100% Design.

***Response**: Agreed. This language will be added to the text of the revised RDWP.*

Comment 22. Section 8.3, second to last paragraph, second sentence, page 32: modify as follows: Upon review and approval by USEPA, after consultation between USEPA and MDEQ, ~~they~~Agency comments will be incorporated in ~~the~~ construction contract documents to be used by the remedial construction contractor for implementation and construction of the remedy.

***Response**: Agreed. This language will be added to the text of the revised RDWP.*

Comment 23. Figure 3: delete this figure.

***Response**: This figure shows groundwater contours across the site and the NBIA and also depicts discharge/recharge to/from CD#30. When evaluated with Figure 4, temporal changes in groundwater flow can be observed. This is an important component of the remedial design for the site and thus should not be removed from the revised RDWP.*

Comment 24. Figures 20, 22 and 23: add non-VAP data points.

***Response**: Figures 20, 22, and 23 were included in approved February 2008 Remedial Investigation report. VAP locations represent samples collected from discrete two foot intervals using low flow sampling techniques. Other data points (such as monitoring wells) represent data collected over larger screened intervals, which has a lower level of precision than VAP sampling. An example of this can be observed on Figure 24. SFMW03S, which is screened between 25 and 30 feet bgs, contained a detection of TCE of 10,000 ppb. A VAP sample (VAP022) collected next to SFMW03S at a depth of 25 to 27 feet resulted in a concentration of 20,000 ppb. Figures referenced in this comment provide a more refined interpretation of contaminant distribution and are sufficient to implement the remedy. We recommend that non-VAP locations not be added to these figures.*

Comment 25. Figure 24: delete this figure.

***Response**: This figure shows VOC concentrations in groundwater beneath Plant 1 and at the property boundary that may be a result of their presence in soil. When evaluated with Figure 25, a more complete picture of groundwater impacts on the site that may result from their presence in soil can be observed. This is an important component of the remedial design and establishing RAOs for the site and thus should not be removed from the revised RDWP.*

Comment 26. Figure 29: add areas with high PCE concentrations (i.e., at VAP 006 and VZP067). These areas should be shown on the figure and included in remedial actions.

***Response**: Based on the response to Comment 13, concentrations of PCE in soil on the site do not appear to be contributing to PCE in groundwater that would enter CD#30 (located more than a third of a mile away from the site) at a concentration that exceeds the generic GSI criteria. Therefore, we do not recommend adding these locations to the remedial design.*

END OF COMMENTS.